

July 20, 2018

Shirin Barfjani, Lead Staff  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

RE: Innovative Clean Transit Measure Comments

Dear Ms. Barfjani:

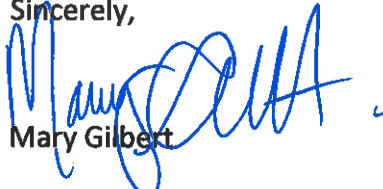
Thank you for the opportunity to comment on the California Air Resources Board's Innovative Clean Transit Regulation concept. On behalf of the San Benito County Local Transportation Authority, a small operator providing approximately 130,000 rides annually, I would like to offer the following comments:

- **Timeline:** As a small operator, we are limited to one full time staff person dedicated to implementing all regulations associated with our transit program. The program timeline currently being considered is too aggressive and does not allow for sufficient opportunities to access funding nor to assess technology, availability, and economic implications prior to enforcement. In addition, the proposed date of 2022 for an informational update to the Air Resources Board may be too early to give an accurate and complete picture of transit agencies' experience with ZEBs and initial review of technology readiness or should be conducted before the initial requirements begin. In addition, as San Benito County is in an air quality attainment area, we urge CARB to consider giving an additional time for areas in attainment to meet these goals, if approved.
- **Costs and service impacts:** ZEB deployment are likely to have financial and operational impacts on transit agencies. This may have an unintended consequence of reduction in transit service and/or fare increases. Our clients primarily use our services for "lifeline" trips: to school, the doctor, work, and other social services that are vital to the community.
- **Vehicle availability:** San Benito LTA's fleet is comprised primarily of smaller cutaway-style vehicles. A major concern for us is that no Altoona-tested vehicles are available on

the market. The ICT proposal should either exclude or defer requirements and engage in a larger conversation with transit agencies about the types of buses that would be subject to the regulation until the technology is proven. In addition, purchase provisions are not sufficiently developed and should be expanded with transit fleet participation. CARB should add a grace period for all transit agencies if any requirement is found to be technologically or economically infeasible.

Thank you for your consideration of these important points and your review of the potential impacts to smaller operators in particular. I am available to discuss this further if you have questions.

Sincerely,



Mary Gilbert

Executive Director